

E FILED ON 2/29/16  
THOMAS E. CROWE, ESQ.  
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Attorney for Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

\* \* \* \* \*

In re:	)	BANKRUPTCY NUMBER:
	)	BK-S-15-16098-BTB
MICHAEL A. AULT, JR.,	)	Chapter 11
	)	
	)	
Debtor .	)	Date: 4/12/16
	)	Time: 1:30 p.m.

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**MOTION TO EXTEND EXCLUSIVITY PERIOD UNDER 11 U.S.C. §1121**

Comes now, the Debtor above named, by and through his attorney THOMAS E. CROWE, ESQ., and moves this court for an order extending the exclusivity period under 11 U.S.C. §1121.

This motion is made and based upon the papers and pleadings on file herein, together with the points and authorities attached hereto.

DATED this 29<sup>th</sup> day of February, 2016.

THOMAS E. CROWE PROFESSIONAL  
LAW CORPORATION  
By /s/ THOMAS E. CROWE  
THOMAS E. CROWE, ESQ.  
2830 S. Jones Blvd., Ste. 3  
Las Vegas, Nevada 89146  
Attorney for Debtor-in-  
possession

**POINTS AND AUTHORITIES**

11 U.S.C. §1121 (d)(1) provides in pertinent part as follows:

(d)(1) Subject to paragraph (2), on request of a party in interest made within the respective periods specified . . . and after notice and a hearing, the court may for cause reduce or increase the 120-day period or the 180-day period referred to in this section.

The Debtor-in-possession will require an additional sixty day extension, to and including June 24, 2016, in which to file his Plan and Disclosure Statement due to a pending motion to value collateral and motion to employ special counsel and the voluminous nature of information required to be produced, additional time to analyze and compile the information necessary to complete the Plan and Disclosure Statement..

Therefore, Debtor-in-possession prays that this Court extend the time in which he has to file his Chapter 11 Plan and Disclosure Statement to and including June 24, 2016. This is Debtors-in-possessions first request for an extension.

DATED this 29<sup>th</sup> day of February, 2016.

Respectfully submitted:

THOMAS E. CROWE PROFESSIONAL  
LAW CORPORATION

By /s/ THOMAS E. CROWE  
THOMAS E. CROWE, ESQ.  
2830 S. Jones Blvd. #3  
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Attorney for Debtor-in-possession

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**UNITED STATES BANKRUPTCY COURT  
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	)	BK-S-15-16098-BTB
MICHAEL A. AULT, JR.,	)	Chapter 11
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**PROPOSED ORDER RE:**  
**MOTION TO EXTEND EXCLUSIVITY PERIOD UNDER 11 U.S.C. §1121**

This matter having come on for hearing this 29<sup>th</sup> day of March, 2016, THOMAS E. CROWE, ESQ., on behalf of the Debtor-in-Possession, having been present, proper notice having been given, upon the arguments of counsel, it is therefore ORDERED AND DECREED:

THAT the time in which Debtor-in-Possession has to file his Chapter 11 Plan and

Disclosure Statement is extended to and including June 24, 2015.

Submitted by:

By /s/ THOMAS E CROWE  
THOMAS E. CROWE, ESQ.  
2830 S. Jones Blvd., #3  
Las Vegas, NV 89146  
Attorney for Debtor-in-possession

In Accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one):

- The Court has waived the requirement set forth in LR 9021(b)(1).
- No party appeared at the hearing or filed an objection to the motion.
- I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:
- I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order.

By /s/ THOMAS E CROWE  
THOMAS E. CROWE, ESQ.